

EXHIBIT 2

November 13, 2020

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-- BRIAN STEVENS --

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Plaintiff,

Case No.
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: November 13, 2020

TIME: 9:42 A.M.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION
OF BRIAN STEVENS, held via Zoom, pursuant to
Notice, before Hope Menaker, a Shorthand Reporter
and Notary Public of the State of New York.

1 -- BRIAN STEVENS --

2 have direct reports?

3 A. Yes.

4 Q. And was he responsible for hiring
5 those direct reports or did they move laterally
6 over to him?

7 A. Varied. It varied.

8 Q. Okay. Did -- the function, was
9 that -- that was reporting up to him, was that a
10 new function or was that -- it was a
11 reorganization where functions were moved
12 underneath him, or both?

13 A. It was a new function.

14 Q. Okay. And what was the new function
15 for his direct reports?

16 A. The charter was to engage externally
17 with customers to make their move to Cloud
18 successful.

19 Q. And so as part of that charter, what
20 were the new hires that were looking to be hired?

21 A. Very accomplished engineering
22 executives.

23 Q. Was there a particular role for which
24 they were being hired?

25 A. There was a singular job

1 -- BRIAN STEVENS --

2 specification.

3 Q. And what was that?

4 A. It was elaborate. It was about being
5 an executive -- engineering executive that would
6 work directly with customers.

7 Q. Was the title of that role technical
8 solutions consultant?

9 A. No, it was not. It was technical
10 director.

11 Q. Was it technical director in the
12 office of the CTO?

13 A. That's correct.

14 Q. And were there a specific number of
15 technical directors that -- that you and he were
16 looking to hire for the office of the CTO?

17 MR. GAGE: Objection.

18 A. I believe our first wave was
19 approximately ten.

20 Q. And when was that first wave?

21 A. It began on recruitment of Will to
22 this new role.

23 Q. In what -- what year was that?

24 A. Oh, I don't -- I would be -- I would
25 be guessing. I can't recall exactly the moment he

-- BRIAN STEVENS --

A. No, not particular, no.

Q. Did you have any -- while you were at Google, did you have any conversations with anyone regarding Ms. Rowe's performance?

A. No, not that I recall.

MR. GAGE: Objection.

Q. While you were at the company, did you have any conversations with anyone regarding Ms. Rowe's compensation?

A. Not that I recall.

MR. GAGE: Objection.

Q. Okay. Did you play any role in setting Ms. Rowe's compensation at the time of her hire?

A. Typically I wouldn't have.

Q. Typically you wouldn't have what?

A. Played a role in her compensation unless an exception needed to be made.

Q. Do you recall any of the technical directors for whom you played a role in setting their initial compensation?

A. No, I don't recall being involved in the compensation.

Q. Did you play any role in setting what

-- BRIAN STEVENS --

Ms. Rowe's level would be?

MR. GAGE: Objection.

A. Yeah, that's a broad question. I was targeting -- you know, we were targeting Level 8 hires in the CTO office, so not directly.

Q. Were some individuals brought in as Level 9?

A. Yes.

Q. Were you involved in the decision to bring individuals in at a Level 9?

A. Indirectly.

Q. In what way were you indirectly involved?

A. As the manager of Will.

Q. And how did that indirect involvement relate to hiring people as Level 9?

A. Typically I'd be the approver, the final approver.

Q. And so would Mr. Grannis make the recommendation with respect to what level someone should be brought in?

MR. GAGE: Objection.

A. Not independently.

Q. What's your understanding of how the

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF BRIAN
STEVENS PURSUANT TO
28 U.S.C. § 1746**

I, BRIAN STEVENS, declare under penalty of perjury that I have read the entire transcript of my testimony taken under oath in my deposition on November 13, 2020, in the above-captioned matter; that the same is a true, complete and correct record of my testimony save and except for corrections as indicated by me on the enclosed Errata Sheet, with the understanding that I offer these changes as if still under oath; and that the answers on the record as given by me and as amended by the corrections indicated on the enclosed Errata Sheet are true and correct.

Signed on the 14th day of December, 2020 in New Boston, New Hampshire


Brian Stevens